

KOCH ♦ LAW

ATTORNEY AT LAW

November 9, 2020

VIA CM/ECF

Hon. Victor Marrero  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 11/10/2020

**Re: Bail Modification for Employment Purposes  
United States v. Lucian Rogers  
1:19-cr-00627-VM-8**

Dear Judge Marrero:

I respectfully request a bail modification for Mr. Rogers to a curfew from 12:00 AM to 9:00 AM with location monitoring to allow him to maintain his employment with United Parcel Service. In the alternative, if the Court will not allow for a modification to curfew, I respectfully request a modification to Mr. Roger's bail conditions to allow for mobile employment to maintain his job with UPS. I have spoken with the Government and PSO Joshua Rothman (Mr. Rogers's Supervision Specialist), and there are no objections to a curfew or to partake in mobile employment. I have requested the modification to the above conditions in line with the Government's adherence to Pre-Trial's recommendation, and I have tailored the request to PSO Rothman's recommendation. I kindly ask Your Honor to take into consideration Mr. Rogers's adherence to his present bail conditions without issue since our last bail hearing on August 14th, 2020, that no issues presented themselves by the time the parties adjourned the October, 16th, 2020 bail hearing, the great challenge obtaining Mr. Rogers birth certificate from the U.S. Virgin Islands, and procurement of a valid New York State identification during the chaotic shutdown of the pandemic.

Respectfully,

/s/

Lee Koch

cc: All Counsel of Record (via CM/ECF)  
cc: E-mailed to Specialist Josh Rothman

**Request GRANTED.** Defendant Rogers's bail conditions are modified to a curfew from 12:00 AM to 9:00 AM with location monitoring.

**SO ORDERED.**

11/10/2020

DATE

  
VICTOR MARRERO, U.S.D.J.

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